

Swomley & Tennen, LLP

Attorneys At Law
227 Lewis Wharf, Boston, MA 02110
(617)227-9443 (617)227-8059(f)
www.swomleyandtennen.com

John G. Swomley*
Eric Tennen

**Also Admitted in New York*

Devon D. Hincapie
Scott A. Katz
Rachael A. Michaud

Of Counsel
Matthew E. Cole

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BY ECF

Emily Cummings, AUSA
U.S. Attorney's Office
1 Courthouse Way, 9th Floor
Boston, MA 02210

RE: United States v. Demetrius Williams
Case No. 1:15-cr-10145-RGS

Dear Emily,

Please have your office provide automatic discovery. Mr. Williams has received no automatic discovery since his June 22, 2015 initial appearance. In light of the government's concerns, while awaiting the Court's determination as to the opposition filed by Mr. Williams concerning the watermarking issue and without waiving his objection to same, he requests that the discovery be provided on compact disks with all .pdf files to be watermarked with his name. Please send one set of disks (or a hard drive) to this office and another to Donald W. Wyatt Detention Center for Mr. Williams's use.

Mr. Williams will agree to an order prohibiting the dissemination of copies of discovery materials except to counsel and to persons working under counsel's direction on the defense of this matter such as office staff, investigators, experts and other counsel employed by or cooperating with the preparation of the defense. All such authorized persons would sign an acknowledgement that they are subject to the order. Mr. Williams will be provided water marked copies of discovery pending the Court's determination as to his opposition and given access on request at his detention center to computers for reviewing discovery materials. Nothing in the foregoing would limit the disclosure of specific discovery materials for the preparation of the defense.

Finally, while Mr. Williams understands the government's wish to use cloud storage and downloading of discovery files, he respectfully objects and declines.

Downloading, opening and watermarking some 8,000 pages of files will result in an unreasonable expenditure of billable hours for counsel and excessive use of CJA/AOC funds. Since the government creates and maintains these files and has system administrator access to them on its servers, it may watermark files more efficiently. Moreover, Mr. Williams further objects to the use of cloud files because the government's server will log data on counsel's IP address, the files counsel accesses and the dates and times counsel views these files. Such data collection, if this in fact does occur, would violate the confidentiality of the lawyer-client relationship.

Sincerely,

/s/ John G. Swomley
John G. Swomley

CERTIFICATE OF SERVICE

Counsel certifies that he has today caused a true copy of this document to be served upon the attorneys for all the parties through the CM/ECF of this District as set forth in the Notice of Electronic Filing and that no party requires service by other means.

/s/ John G. Swomley
John G. Swomley